

Federal Defenders  
OF NEW YORK, INC.

Southern District  
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May 28, 2025

**By ECF and Email**

Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. Caleb Eccles-Gonsalves  
24 Cr. 391 (RMB)

ORDERED:  
Date: 5/29/25 Richard M. Berman  
Richard M. Berman, U.S.D.J.

Dear Judge Berman,

I write to respectfully request that the Court adjourn the motions deadline in the above-captioned case, for one week. Specifically, we ask for the following adjusted deadlines: defense motions due June 4, government responses due June 24, replies due July 2. A conference for ruling on the motions is scheduled for July 15, which can be adjourned to any date that is convenient to the Court. The parties have been discussing a pre-trial disposition and we are nearing the end of those negotiations; we seek this adjournment to allow those conversations to conclude before motions are filed.

The government, by Assistant United States Attorney Ashley Nicolas, has no objection to this application.

Thank you for your consideration.

Respectfully submitted,

/s/  
Sylvie Levine  
Counsel for Caleb Eccles-Gonsalves